

PRIVACY POLICY

1. INTRODUCTION

At Wynwallet, we respect your privacy and are committed to protecting Users' personal data, in accordance with the General Data Protection Regulation (EU) 2016/679 (GDPR) and Greek Law 4624/2019.

This Policy describes:

- what data we collect,
- for what purposes and on what legal basis,
- with whom we share it,
- how long we retain it,
- and your rights.

This Policy forms a single and integral part of the Terms of Use.

2. DATA CONTROLLER

The Data Controller is:

Wynwallet Single-Member Private Company (IKE), registered office at **PLATEIA IPPODAMEIAS 8, 18531 PIRAEUS**,

G.E.MI. **186908201000**, Tax ID (A.F.M.) **802990812**.

Contact email: **support@wynwallet.app**

3. CATEGORIES OF DATA WE COLLECT

(A) Account Data

Email, password (in encrypted/hashed form), mobile number (where required), account identification details, and technical identifiers.

(B) Receipt & Transaction Data (Receipt Logs)

When you submit receipts, we collect/process:

- receipt image/photo,
- data extracted from the receipt (such as merchant and total amount),
- purchase and submission date/time,
- unique identifiers (e.g., QR code/codes) where available,
- technical logs related to submission and validity/fraud checks.

(C) Payment Data (SEPA)

IBAN and information necessary to execute a SEPA transfer, as well as payment history / failed-payment history.

We do not collect/store payment card details, as payouts are made only via SEPA.

(D) Usage & Technical Data

IP address, device identifiers, operating system, app version, usage events, error logs, where applicable.

(E) Communications & Support

Data you provide when you contact us (e.g., email, request content, attachments).

(F) Camera & Image Data

The Wynwallet app uses your device camera solely to allow you to photograph/scan the receipt you wish to submit. Wynwallet does not access your camera or your photos without your own action/instruction (e.g., when you choose to take a photo or upload an image from your gallery).

The receipt images you choose to submit are uploaded to our servers (or to infrastructure of service providers acting as processors) for the purposes of:

- processing/reading the receipt content (e.g., merchant, total amount, date/time),
- validating authenticity and preventing fraud,
- displaying the “instant win check” result and maintaining a submission history.

Wynwallet does not collect images or video from your camera in the background and does not use the camera for facial recognition or biometric identification purposes.

Where technically feasible, we limit the collection/retention of image metadata (e.g., EXIF such as geolocation) to what is strictly necessary for the operation and security of the Service.

4. APP PERMISSIONS

To operate, the Wynwallet app may request access to certain device functions/data, depending on your operating system and the settings you choose:

- **Camera:** Used to photograph/scan receipts for submission and to perform the “instant win check”.
- **Photos/Files (Gallery/Storage) (where applicable):** If you choose, you may upload a receipt image from your device gallery.
- **Internet/Connection Data:** Required to communicate with Wynwallet systems (receipt submission, receiving results, syncing history, and account operation).
- **Notifications (Push Notifications) (if enabled):** For updates regarding receipt submission status, the “win check” result, and/or payout status. You can disable notifications from your device settings.

Granting the above permissions is optional; however, refusing certain permissions (in particular camera access or access to photos/files, and internet access) may limit or make it impossible to use core features of the Service, such as submitting receipts. Wynwallet does not gain access to the User’s entire photo library—only to images the User explicitly selects to upload/submit.

5. PURPOSES OF PROCESSING & LEGAL BASES

We process data for the following purposes:

1. **Provision of the Service** (account creation/management, receipt submission, displaying the win check result, maintaining receipt history, including photographing/scanning receipts via the camera and/or uploading an image from the User’s device, and technical processing of images to extract receipt data).
Legal basis: Article 6(1)(b) GDPR (performance of a contract).
2. **Payouts via SEPA**
Legal basis: Article 6(1)(b) and, where required, Article 6(1)(c).
3. **Security, fraud prevention, compliance, and protection of legitimate interests** (validity checks, abuse prevention, investigation of violations)
Legal basis: Article 6(1)(f) GDPR (legitimate interest).
4. **Legal/tax/accounting obligations**
Legal basis: Article 6(1)(c) GDPR.
5. **Operational communications** (e.g., notifications about submission status/payouts)
Legal basis: Article 6(1)(b) and/or Article 6(1)(f), as applicable.

6. Marketing / promotional communications (if provided)

Legal basis: Article 6(1)(a) GDPR (consent), where required.

6. AUTOMATED DECISION-MAKING

The “instant win check” result and/or validity checks may be based on automated processing. In cases of rejection due to technical inability or security checks, you may contact **support@wynwallet.app** to request a review, where feasible.

7. RECIPIENTS OF DATA

We may share data only to the extent necessary:

- with technology/hosting/support/analytics providers acting as processors,
- with banks and/or providers involved in executing SEPA payments,
- with advisors (legal/accounting) in the context of lawful operation,
- with public authorities following a lawful request or obligation.

Where possible, we share data in pseudonymized or aggregated form.

8. TRANSFERS OUTSIDE THE EEA

If providers outside the EEA are used, we apply appropriate safeguards (e.g., standard contractual clauses) where required by law.

9. RETENTION PERIOD

We retain data only for as long as necessary:

- **Account data:** as long as the account remains active.
- **Receipt/history data:** as required for operation, dispute resolution, security and fraud prevention, and any legal obligations.
- **Payment data:** as required to execute/prove payments and comply with accounting/tax obligations.

After retention periods expire, data is deleted or anonymized.

10. SECURITY

We implement appropriate technical and organizational measures to protect data. Despite these measures, you acknowledge that transmission over the internet may not be completely secure.

11. DATA SUBJECT RIGHTS

You have the right to:

- information/access,
- rectification,
- erasure (where applicable),
- restriction,
- objection,
- data portability,
- withdrawal of consent (where processing is based on consent),
- lodge a complaint with the Hellenic Data Protection Authority.

To exercise your rights, contact: **support@wynwallet.app**. We will respond within one (1) month, unless an extension is required by law.

Hellenic Data Protection Authority: Kifisias 1-3, 115 23 Athens, Tel. +30 210 6475600, email: contact@dpa.gr

12. CHILDREN'S PRIVACY

The Service is not intended for persons under 18. We do not knowingly collect data from minors. If we become aware of such collection, we will delete it.

13. POLICY UPDATES

This Policy may be amended. The latest version will be posted on the Website/App.